

# **SPL Process ER/DL Meeting Meeting Minutes August 26, 2015 (and some from July 29, 2015)**

**Chair of today's meeting:** Pat Cowall

Link to the SPL wiki:

<http://spl-work-group.wikispaces.com/share/view/51351516>

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**Agenda:**

1. Product Concept Indexing files: Lonnie Smith discussed with live demonstration at both the July 29 and August 26, 2015 meetings. The following numbers summarize the discussion at the 2 meetings:

## **Issue**

- FDA is receiving multiple SPL files all referencing the same NDA number but have different active ingredients/strengths.
- Primarily with repackers/relabelers:

## **Validation procedure – current:**

### **Existing Validation Procedures Similar to those Related to Future Product Concept Indexing SPL Validation Procedures**

3.1.7.26 If the code is C73584 (ANDA), C73585 (BLA), or C73594 (NDA) and the application number was already submitted, then the active ingredient UNII is the same as in any previous submission of a product with the same application number.

3.1.2.7 If the NDC product source (equivalent product) is present, then the active ingredient UNII and active ingredient strength are the same as that of product source.

3.1.2.8 If the NDC product source (equivalent product) is present, then the product characteristics of size are the same as that of product source.

3.1.2.9 If the NDC product source (equivalent product) is present, then the product characteristics of shape is the same as that of product source.

3.1.2.10 If the NDC product source (equivalent product) is present, then the product characteristics of color are the same as that of product source.

3.1.2.11 If the NDC product source (equivalent product) is present, then the product characteristics of imprint code are the same as that of product source.

There will be a new validation procedures saying that the active ingredients/strengths for the same NDA numbers should be the same.

## 15 Indexing - Product Concept

### 15.1 Header

#### 15.1.1 Document type

##### Validation Procedures

15.1.1.1 Document code is as above

15.1.1.2 If a document with the same set id has been previously submitted, then it is of the same type.

#### 15.1.2 Author information

Product concept indexing is maintained by FDA.

In the future, FDA will be comparing product concepts in each SPL file to the reference drug SPL.

```
<document>
...
<author .../>
<relatedDocument typeCode="DRIV">
  <relatedDocument>
    <setId root="20d9b74e-e3d8-4511-9df9-cec2087372fc"/>
  </relatedDocument>
</relatedDocument>
<component .../>
</document>
```

##### Validation Procedures

15.1.3.1 There is reference labeling specified.

15.1.3.2 Type code attribute is as above.

15.1.3.3 There is no document id

15.1.3.4 There is a set id

15.1.3.5 Set id is a GUID

15.1.3.6 Reference labeling set id is the set id of a product's document.

15.1.3.7 If a product concept indexing file for the same reference labeling set id has been previously submitted, then it is a prior version of this indexing document with the same set id.

Will validate product concept to make sure that the file matches the primary product data for the NDA.

- Will not validate against exact dosage form (capsule versus specific type of capsule)
- Still testing validation procedures. Implementation timing of validation still TBD.

```
<manufacturedProduct>
  <code code="ba328d9b-c64c-fca9-2ee7-9882d2ac3f32"
        codeSystem="2.16.840.1.113883.3.3389" />
  <formCode code="C42916" codeSystem="2.16.840.1.113883.3.26.1.1"
            displayName="CAPSULE, EXTENDED RELEASE" />
```

#### Validation Procedures

15.2.2.1 There is a product concept code with code system 2.16.840.1.113883.3.3389.

15.2.2.2 Code has the format of 8-4-4-12 hexadecimal digits where letter digits are lower case.

15.2.2.3 Code value matches the specified properties according to the Abstract Product Concept Code Specification (See 15.2.4).

15.2.2.4 There is a form code and it comes from the Product Concept Dosage Form List

## Examples of the product indexing file:

Specifies the set ID of the reference drug (4<sup>th</sup> line)

Copy set ID and paste it into Daily Med. (Link currently isn't active, but may be active in the future).

Validation will check the submitted SPL files against the data in the reference file (for same active ingredient) – to make sure that the active and inactive ingredients are the same.

The screenshot shows a web browser window with the address bar displaying a file path: C:\Users\SMITHLO\Desktop\sample\NDA 018936 Eli Lilly Prozac caps\0a2c098e-1ab6-432e-b937-92fd0b\Windows Internet Explorer. The browser is displaying a webpage with the following content:

**Indexing - Product Concept**  
- fluoxetine hydrochloride capsule  
Food and Drug Administration  
Reference Label Set Id: c88f33ed-6dfb-4c5e-bc01-d8e36dd97299

-----

**Abstract Product Concept**  
capsule

**Product Information**

Product Type	Item Code (Source)
INDEXING - PRODUCT CONCEPT	S=4536c3-16ac-a044-2c96-36348ed59ec8

**Active Ingredient/Active Moiety**

Ingredient Name	Basis of Strength	Strength
FLUOXETINE HYDROCHLORIDE (UNII: 19W7N6B1KJ) (FLUOXETINE - UNII: 01K638UP4D)	FLUOXETINE	20 mg

**Application Product Concept**

**Product Information**

Done

Computer | Protected Mode: Off

https://meet.lilly.com/cowall-hanover\_patricia\_v/GLSRGR72?sl=1

Pages - connectGSK Home page

Microsoft Lync Web App

L-Pact Meeting - L-PACT ... My Performance Objectives Suggested Sites Web Slice Gallery Cross Functional Training ...

SPL ER/DL Process Team - Webinar - IDMP (106 Participants)

T Brunone

Exit Meeting

07:10

Currently sharing Give Control

Stop Sharing

File Edit View Favorites Tools Help

Convert Select

Favorites Precision Medicine Initiati... NCI Thesaurus DQCP Home Inside.FDA - COR Commu... FD&C Act Chapter V Drug... Suggested Sites Structured Product Labeli... Structured Product Labeli...

C:\Users\SMITHLO\AppData\Local\Temp\1\wz0483\b8ee525f-67fb-39fb-91da-7e47ac54581d\b8ee525f-67fb-39fb-91da-7e47ac54581d.xml

To help protect your security, Internet Explorer has restricted this webpage from running scripts or ActiveX controls that could access your computer. Click here for options...

**Indexing - Product Concept**  
**- bupropion hydrochloride tablet**  
**Food and Drug Administration**  
**Reference Label Set Id: 60525754-0d2b-4ba4-918a-1c9d3ef89b2**

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**Abstract Product Concept**

tablet

**Product Information**

Product Type	INDEXING - PRODUCT CONCEPT	Item Code (Source)	8e697b81-475c-62e1-3880-77eb29c609a9
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**Active Ingredient/Active Moiety**

Ingredient Name	Basis of Strength
BUPROPION HYDROCHLORIDE (UNII: ZG7ESPOY8O) (BUPROPION - UNII: 012G3TPX31)	BUPROPION HYDROCHLORIDE

**Application Product Concept**

**Product Information**

Product Type: INDEXING - PRODUCT CONCEPT

Item Code (Source): 8e697b81-475c-62e1-3880-77eb29c609a9

Computer | Protected Mode

GUEST -

- If your file fails validation, then you will have to correct the file. Manual validations will be granted to allow corrections.
- They will not publish separate concept files for every NDA and ANDA. All the ANDAs will be listed within the same product indexing file.

**Where will the indexing files will be loaded? From SPL Resources Page:**

<a href="#">(PET) Drug SPL</a>
<a href="#">Precondition Categories</a>
<a href="#">Product Concept Indexing SPL</a>
<a href="#">Race</a>
<a href="#">Route of Administration</a>

No files there currently. Example of what the page will look like in the future:

[Home](#) [For Industry](#) [Data Standards](#) [Structured Product Labeling](#)

**Data Standards**

**Structured Product Labeling**

[Business Entity Identifiers](#)

[Business Operation](#)

[Business Operation Qualifier](#)

[Code System Object Identifiers](#)

[Combination Product Types](#)

[Contributing Factor - General](#)

[Document Type including Content of Labeling Type](#)

[Dosage Forms](#)

[Electronic Animal Drug Product Listing Directory](#)

[Equivalence Codes](#)

[Flavor](#)

[ISO 3166-1 Alpha-3 Country Code](#)

[Indication Category](#)

[Intent of Use](#)

[Lab Test](#)

### Substance Indexing SPL Files

Substance indexing Structured Product Labeling (SPL) documents may be downloaded from this web page. A description of the substance indexing SPL files is included in the [Indexing SPL Fact Sheet](#). More substance indexing SPL files will be posted as they are made available.

List of set IDs and document IDs included in substance indexing SPL documents (zip file)

July 2013 (zip file)

August 2013 (zip file)

September 2013 (zip file)

November 2013 (zip file)

December 2013 (zip file)

January 2014 (zip file)

February 2014 zip file

March 2014 (zip file)

May 2014 - Part One (zip file)

May 2014 - Part Two (zip file)

May 2014 - Part Three (zip file)

May 2014 - Part Four (zip file)

May 2014 - Part Five (zip file)

May 2014 - Part Six (zip file)

May 2014 - Part Seven (zip file)

May 2014 - Part Eight (zip file)

May 2014 - Part Nine (zip file)

May 2014 - Part Ten (zip file)

May 2014 - Part Eleven (zip file)

**Files will be maintained by FDA:**

**15 Indexing - Product Concept**

**15.1 Header**

**15.1.1 Document type**

**Validation Procedures**

15.1.1.1 Document code is as above

15.1.1.2 If a document with the same set id has been previously submitted, then it is of the same type.

**15.1.2 Author information**

Product concept indexing is maintained by FDA:

## **Timing:**

Product concept indexing file:

- Project started in 2013.
- Ready to publish the first batch soon – about 1700 files.
- FDA will publish on the FDA web page – until NLM publishes them for download on the Daily Med site.
- Timing of validation implementation is still TBD (testing in process)

Implementation Guide:

- Product concept changes will be published be posted by early September

## **2. Upcoming changes to the IG -- Lonnie**

- Product Concept Indexing File – IB will be published hopefully by early September.
- Another type of indexing file is coming. IG will published again within 30 to 45 days to include this. It will be very short and technical.

## **Post meeting note (7/31/2015):**

Terry Brunone asked Lonnie about the LDD file, and any possibilities of it being cross-checked against the PCIT. Here's his response, and

(1) a bit more additional information on the Product Concept Indexing file,

The LDD SPL files will not be directly validated against the product concept indexing SPL files. The drug & biologic product SPL files will be validated against the product concept indexing SPL files and then a subset of the information in the LDD SPL files will continue to be validated against the drug & biologic product SPL documents.

The product concept indexing SPL file validation procedures are actually an “upgrade” of the following existing validation procedures (if you add the dosage form to them):

3.1.7.26 If the code is C73584 (ANDA), C73585 (BLA), or C73594 (NDA) and the application number was already submitted, then the active ingredient UNIs are the same as in any previous submission of a product with the same application number.

3.2.4.5 If the active ingredient is in the active-ingredient-active-moiety-validation-list (see FDA SPL web page for list

<http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>), then the active moiety and basis of strength is the corresponding active moiety and basis of strength respectively in this list, except if the document type is for bulk ingredient (53409-9).

3.2.4.6 If the active ingredient is not in the active-ingredient-active-moiety-validation-list (see FDA SPL web page for list

<http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>), then the active moiety name does not include any of the names in the active moiety validation



(counter ion) list (see FDA SPL web page for list  
<http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>),  
except if the word appears by itself optionally followed by "(ester)", "cation" or "anion" or "ion".

(2) an update to this document (I'd not come across it before on the SPL Resources pg):

<http://www.fda.gov/downloads/forindustry/datastandards/structuredproductlabeling/ucm345939.pdf>

(3) the implementation guides / validation rules update is likely to show up soon

## **New Business from Aug 26, 2015 meeting:**

### 3. DEA schedule validation (Lonnie)

- a. Complaint – company had miscoded their DEA schedule in their SPL and it caused problems with downstream users. They rely on this information.
- b. Validation will be implemented for CDER products – against an FDA excel spreadsheet. Complex validation.
  - i. Products that are scheduled will be required to have a DEA schedule in the SPL.
  - ii. Spreadsheet will be posted on the SPL resource website.
  - iii. May be down to NDC product level.
- c. Hope to implement in September
- d. Controlled schedules are a relatively small list.
- e. Please review the spreadsheet and contact Lonnie if you see issues.

### 4. Incorrect marketing category type (ANDA vs NDA) (Lonnie)

- a. FDA, healthcare providers, and universities use this information and assume it is correct. There aren't very many of them, but it is concerning to users.
- b. Notice this when download multiple SPLfiles, they see that the same NDA numbers are sometimes referred to as NDAs and sometimes ANDAs.
- c. Errors – primarily in PLDs, repackers and relabelers.
- d. Either FDA or NLM will publish set ID's that have discrepancies.
- e. Can copy set ID from list and post into DailyMed.

### 5. "Liquid" dosage form in product data elements section (Lonnie)

- a. Getting feedback that companies are using this dosage form incorrectly.
- b. Definition per FDA webpage: liquids are a pure chemical – no inactive ingredients, not a solution in water or in some other diluent.
  - i. Note: Definitions for terms are posted on the FDA web page or as part of the NCI thesaurus. This definition is posted on FDA web site.
- c. Potential future validation will be developed to check for this.
- d. Companies should review their data to make sure that your SPL data is coded correctly. Lonnie will grant manual override for corrections.



6. Add document type being created for “Drug for further processing” (Lonnie)
  - a. Why? People are getting confused when they see the document type of “Bulk ingredient” - -- for products that use the marketing type of “Drug for further processing” – ie repackaging.
  - b. This new document type will be created soon. Specifically so that
    - i. Document type = Drug for further processing
    - ii. Marketing category = Drug for further processing
  - c. APIs should continue to use the
    - i. document type of “Bulk ingredient”.
    - ii. Marketing category should be “bulk ingredient”.
    - iii. No other inactive ingredients.
  - d. Will keep document type of “bulk ingredient” for bulk ingredients.

## **Announcements:**

7. New SPL Schema – R6 published on the SPL Resource page
8. SPL Jamboree – Thursday Sept 24, at NLM  
National Library of Medicine’s 2015 DailyMed/RxNorm Jamboree Workshop is scheduled for September 24, 2015. Please review this web page for more details, including the workshop’s agenda: <http://dailymed.nlm.nih.gov/dailymed/dailymed-announcements-details.cfm?date=latest>.

### Networking Meeting :

- Sept 23, 7 pm on – SPL Networking meeting in downtown Bethesda, about 4 blocks from the Doubletree Hotel:

Bethesda RockBottom - we have the Phillips room

7900 Norfolk Ave

<https://www.google.com/maps/place/Rock+Bottom+Restaurant+%26+Brewery/@38.9899612,-77.0973408,16.05z/data=!4m2!3m1!1s0x0:0xf01b2544bb142f71>

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